

Attorney(s): **Charles Novins, Esq.**
 Law Firm: **Charles Novins appearing Pro Se**
 Address: **54 East Water St.**
Toms River, NJ 08753

Telephone No.: **(732) 341-4077**
 Fax No.: **(732) 341-4490**
 E-mail:
 Attorney(s) for Plaintiff(s): **Charles Novins**

Charles Novins

Plaintiff(s)

vs.

Kevin A. Cannon

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
OCEAN COUNTY

DOCKET NO. **L-705-09**

CIVIL ACTION
Summons

From the State of New Jersey

To the Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$_____ and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: March 11, 2009

/s/ Theodore J. Letter (Acting)

Superior Court Clerk

Name of Defendant To Be Served: **Kevin A. Cannon**

Address of Defendant To Be Served: **Kevin A. Cannon, 19 St. Georges Ave, Monroe, NY 10095**

Directory of Superior Court Deputy Clerk Offices

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main Street
Hackensack, NJ 07601-0769
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Floor, Court Facility,
49 Rancocas Road
Mount Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(800) 496-4570

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
First Floor, Hall of Justice
101 South Fifth Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 964-4520
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 North Main Street, Box DN-209
Cape May Court House, NJ 08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Broad & Fayette Streets, P.O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 692-6207
LEGAL SERVICES
(856) 451-0003

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Floor, Court House
1 North Broad Street, P.O. Box 750
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Courthouse, First Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 735-2611
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 South Broad St., P.O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court
Middlesex Vicinage
Second Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Monmouth County Courthouse
71 Monument Park, P.O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Washington and Courts Streets, P.O. Box 910
Morristown, NJ 07960-0910
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:

Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754
LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Passaic County Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
92 Market Street, P.O. Box 29
Salem, NJ 08079
LAWYER REFERRAL
(856) 678-8363
LEGAL SERVICES
(856) 451-0003

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
40 North Bridge Street
P.O. Box 3000
Somerville, NJ 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
First Floor, Court House
2 Broad Street
Elizabeth, NJ 07207-6073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Warren County Courthouse
413 Second Street
Belvidere, NJ 07823-1500
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(908) 475-2010



CIVIL CASE INFORMATION STATEMENT

(CIS)

Use for Initial Law Division

Civil Part pleadings (not motions) under Rule 4:5-1.

**Pleading will be rejected for filing, under Rule 1:5-6(c),
if information above the black bar is not completed or
if attorney's signature is not affixed.**

FOR USE BY CLERK'S OFFICE ONLY

PAYMENT TYPE: CK CG CA

CHG/CK NO.:

AMOUNT:

OVERPAYMENT:

BATCH NUMBER:

ATTORNEY/PRO SE NAME Charles Novins, Esq.		TELEPHONE NUMBER (732) 341-407	COUNTY OF VENUE Ocean
FIRM NAME (If applicable) Charles Novins appearing Pro Se		DOCKET NUMBER (When available) L 705-09	
OFFICE ADDRESS 54 East Water St. Toms River, NJ 08753		DOCUMENT TYPE Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Charles Novins		CAPTION Kevin A. Cannon, et al.	
CASE TYPE NUMBER (See reverse side for listing) 609	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY, IF KNOWN <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN		

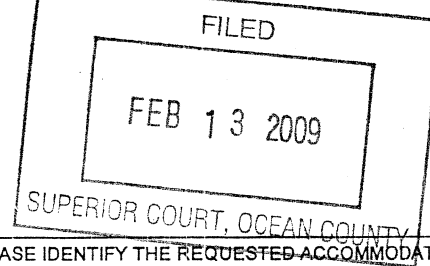
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	IF YES, IS THAT RELATIONSHIP <input type="checkbox"/> EMPLOYER-EMPLOYEE <input type="checkbox"/> FAMILIAL	<input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> BUSINESS	<input checked="" type="checkbox"/> OTHER (explain) _____
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DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? ☐ YES ☐ NO

USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION: **This matter involves libelous and other criminal acts committed via the internet and having a basis in contacts with the State of New Jersey.**



<input checked="" type="checkbox"/> DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION: _____
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, FOR WHAT LANGUAGE: _____

ATTORNEY SIGNATURE

CHARLES NOVINS, ESQ.
54 EAST WATER STREET
TOMS RIVER, NEW JERSEY 08754
(732) 341-4077
Plaintiff *pro se*

Charles Novins, ESQ., P.C.
And Charles Novins, Personally

PLAINTIFFS

v.

Kevin A. Cannon,
Kevin Michael Fries,
Jim Kelso
Rhonda Lea Kirk AKA Fries
Vincent Lamb,
Carl R. Osterwald,
Rick Mather
Albert C. Young,
Sean Monaghan,
Google, Incorporated, A
Corporation Doing Business in the
State Of New Jersey,
TSB Bearings, Inc., A
Corporation Doing Business in the
State Of New Jersey,
Databasix, A
Corporation Doing Business in the
State Of New Jersey,
Oakland Community College,
Bloomfield Hills, MI
XYZ Partnerships (1-100)
John and Jane Does (1-100),
ABC Entities/Corporations (1-100),
John and Jane Roes (1-100),
including, but not limited to,
unnamed and/or unknown
defendants yet to be discovered
used by these defendants and others.

DEFENDANTS

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, OCEAN COUNTY

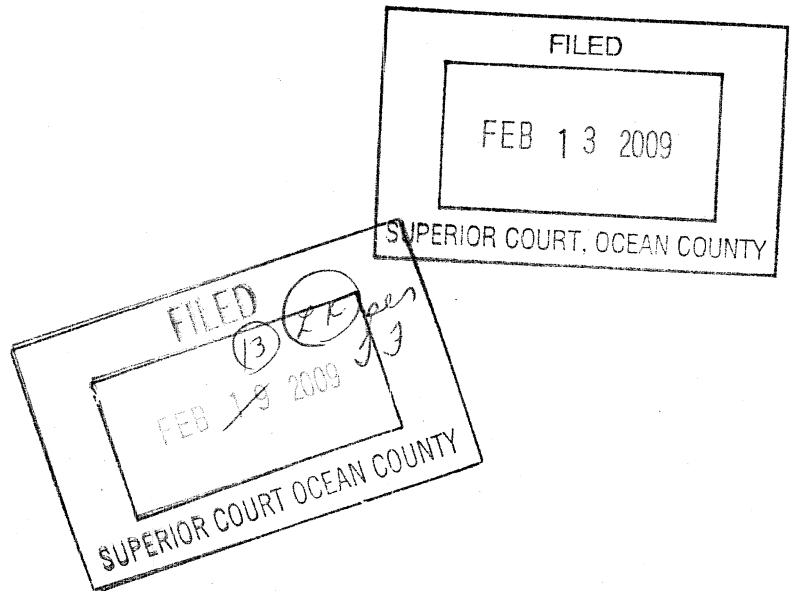
DOCKET NO.

L-705-09

CIVIL ACTION

COMPLAINT, DEMAND FOR INSURANCE
INFORMATION, DEMAND FOR TRIAL BY
JURY.

13th ZK per J3
FEB 13 2009



Plaintiffs, Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing *Pro Se*, by way of Complaint against Defendants listed above, and others yet to be discovered, hereby avers as follows:

COUNT ONE - DEFAMATION

1. Plaintiff is and at all times material hereto was an adult individual, incorporated as a Professional Corporation in the State of New Jersey, and practicing at the above address, where contact may be made, and was an individual living at a residential address in the County of Ocean (the specifics of which are not relevant to this action.). Plaintiff has at all times enjoyed a good name and reputation in the community in which he resides.
2. Defendant Kevin A. Cannon, on February 13, 2008, caused to be published a libelous publication in a world-wide forum, alleging Plaintiff's law firm was staffed by drug addicts, and that Plaintiff personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Kevin A. Cannon, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation emotional distress.
3. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider

employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se,, demands judgment against Defendant, Kevin A. Cannon, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT TWO - DEFAMATION

4. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

5. Defendant Kevin A. Cannon, on various dates within the preceding six years, caused to be published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Kevin A. Cannon, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation emotional distress.

6. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

7. WHEREFORE, Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Kevin A. Cannon, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT TWO - DEFAMATION

8. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

9. Defendant Kevin Michael Fries, on various dates within the preceding six years, caused to be published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff

personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Kevin Michael Fries, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation emotional distress.

10. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Kevin Michael Fries, for damages both compensatory and punitive, plus interest and costs of suit.

11. WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Kevin Michael Fries, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT THREE - DEFAMATION

12. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

13. Defendant Jim Kelso on various dates within the preceding six years, caused to be published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Jim Kelso, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation emotional distress.

14. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se,, demands

judgment against Defendant, Jim Kelso, for damages both compensatory and punitive, plus interest and costs of suit.

15. WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Jim Kelso, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT TWO - DEFAMATION

16. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

17. Defendant Rhonda Lea Kirk, on various dates within the preceding six years, caused to be published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Rhonda Lea Kirk, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation emotional distress.

18. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced

their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Rhonda Lea Kirk, for damages both compensatory and punitive, plus interest and costs of suit.

19. WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Rhonda Lea Kirk, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT TWO - DEFAMATION

20. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

21. Defendant Vincent Lamb, on various dates within the preceding six years, caused to be

published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Vincent Lamb, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation emotional distress.

22. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Vincent Lamb, for damages both compensatory and punitive, plus interest and costs of suit.

23. WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional

Corporation registered and operating in the State of New Jersey, and appearing Pro Se, demands judgment against Defendant, Vincent Lamb, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT TWO - DEFAMATION

24. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

25. Defendant Carl R. Osterwald, on various dates within the preceding six years, caused to be published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Carl R. Osterwald, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation emotional distress.

26. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually

experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Carl R. Osterwald, for damages both compensatory and punitive, plus interest and costs of suit.

27. WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Carl R. Osterwald, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT TWO - DEFAMATION

28. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

29. Defendant Rick Mather, on various dates within the preceding six years, caused to be published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Rick Mather, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation

emotional distress.

30. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Rick Mather, for damages both compensatory and punitive, plus interest and costs of suit.

31. WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se., demands judgment against Defendant, Rick Mather, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT TWO - DEFAMATION

32. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

33. Defendant Albert C. Young, on various dates within the preceding six years, caused to be published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff personally was a person of ill repute. A copy of this publication is attached as Exhibit "A" and was repeatedly published numerous times thereafter by the Defendant, Albert C. Young, with specific intention of harming the Plaintiff's practice, and also with the intent to cause humiliation emotional distress.

34. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se,, demands judgment against Defendant, Albert C. Young, for damages both compensatory and punitive,

plus interest and costs of suit.

35. WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se,, demands judgment against Defendant, Albert C. Young, for damages both compensatory and punitive, plus interest and costs of suit.

COUNT TWO - DEFAMATION

36. Plaintiff repeats each and every allegation set forth in Count One of the Complaint as if fully set forth herein.

37. Defendant Sean Monaghan, on various dates within the preceding six years, caused to be published a libelous publication in a world-wide forum, alleging various instances of libel *per se* and various other instances of damaging libel regarding Plaintiff's law firm and that Plaintiff personally was a person of ill repute. Defendant, Sean Monaghan, had specific intention of harming the Plaintiff's practice, and also had the intent to cause humiliation and emotional distress.

38. As a result of the intentional publication of the false and defamatory allegations to a worldwide forum, several clients indicated they had read and found the comments influenced their decisions regarding representation. Also, individuals wishing to be employed by the firm

commented several times that the false publication had influenced them to reconsider employment in the Novins firm. Colleagues in the legal community expressed concern regarding the defamatory comments. The revenues of the business declined demonstrably during this period after the publication on February 13, 2008. Moreover, the Plaintiff individually experienced emotional distress and humiliation as a result of the publication.

WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se,, demands judgment against Defendant, Sean Monaghan, for damages both compensatory and punitive, plus interest and costs of suit.

39. WHEREFORE, the Charles Novins, Esquire, appearing personally, and as a Professional Corporation registered and operating in the State of New Jersey, and appearing Pro Se,, demands judgment against Defendant, Sean Monaghan, for damages both compensatory and punitive, plus interest and costs of suit.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury as to all issues so triable.

40. Defendants ABC Corporation 1-10, XYZ Partnership 1-10, and John and Jane Doe 1-100, are fictitious named identities of persons, identities unknown, who acted, assisted and/or participated in the assault of the Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants ABC Corporation, XYZ Partnership and John and Jane Doe's jointly, severally and together with interest and costs of

suit.

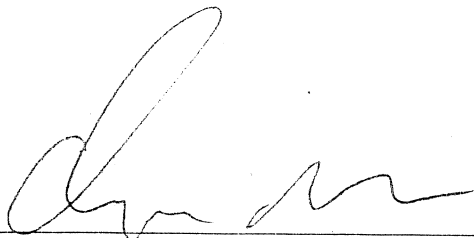
DEMAND FOR INSURANCE INFORMATION

Pursuant to R.4:1 0-2(b), demand is hereby made that Defendants disclose to Plaintiffs whether there are any insurance agreements or policies under which any person or firm carrying on insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

CERTIFICATION

Pursuant to R. 4:5-1, it is hereby stated that no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. Additionally, I recognize the continuing obligation of each party to file and serve on all parties and the Court an amended Certification if there is a change in the facts stated in this original Certification.

Dated: February 13, 2009



CHARLES NOVINS, ESQ.

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Message from discussion Law Offices of Charles Novins hires drug addicts to fill your legal needs

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Path: g2news1.google.com!postnews.google.com!e25g2000prg.googlegroups.com!not-for-mail
 From: Kevin.Cannon...@googlemail.com
 Newsgroups: alt.culture.alaska, alt.battlestar-galactica, alt.tv.scifi.channel,
 alt.tv.firefly, alt.tv.stargate-atlantis
 Subject: Law Offices of Charles Novins hires drug addicts to fill your legal
 needs
 Date: Tue, 12 Feb 2008 23:15:05 -0800 (PST)
 Organization: http://groups.google.com
 Lines: 54
 Message-ID: <0f93bd9c-b4a7-4d17-8eb2-f793166900f7@e25g2000prg.googlegroups.com>
 NNTP-Posting-Host: 85.25.136.135
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 Content-Transfer-Encoding: 7bit
 X-Trace: posting.google.com 1202886905 3679 127.0.0.1 (13 Feb 2008 07:15:05 GMT)
 X-Complaints-To: groups-abuse@google.com
 NNTP-Posting-Date: Wed, 13 Feb 2008 07:15:05 +0000 (UTC)
 Complaints-To: groups-abuse@google.com
 Injection-Info: e25g2000prg.googlegroups.com; posting-host=85.25.136.135;
 posting-account=7iJreAoAAAA6bynTmf5I2nFzosKYMIQ9
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 X-HTTP-UserAgent: Opera/9.25 (X11; Linux i686; U; en),gzip(gfe),gzip(gfe)

Until recently, the website of Charles Novins aka Atlas Bugged confessed to an embarrassing not-so-secret fact regarding Novin's hiring practices. Charles Novins hires drug addicts to fill your legal needs, these drug addicts have full access to your confidential information, and represent an ongoing potential exposure within the realm of identity theft and breach of confidentiality. A number of his clients have experienced identity theft. A number of his clients have suffered staggering losses. The savvy prospective client must ask him or herself, do I really want to hire the services of a firm that hires drug addicts? Do I really want my confidential and privileged information in the hands of those who pop pills and push chemicals into their bodies without medical supervision?

Yes, Charles Novins made the unprofessional remarks disclosing that he shuns drug testing and encouraging folks who "inhale" or "whatever" to apply. His law firm welcomes them. He made these remarks due to his inability to distinguish between reality and fantasy, to Novins, this was a stab at the people who laugh at his inability to comport himself properly on Usenet and Internet websites. To Novins this "punished" the people who laugh at him yet somehow such foolish disclosure did not harm his practice. If true that his practice is not harmed by his public advertisement that he hires drug addicts, why were these remarks about his hiring of drug addicts removed from his website?

Professional attorneys do not get into flame wars in newsgroups that exist to headquarter people who flood other newsgroups with attacks upon the "kookiness" of the inhabitants. Professional attorneys do not brag about their ability to insult others while attacking those who insult others. Professional attorneys, employed professional attorneys do not have time for such silliness. Charles Novins does, though, because Charles Novins is not a professional attorney, he is a progressive mentally ill embarrassment to his family.

Everything Novins does seems to revolve around Usenet and long hours spent watching sci-fi and fantasy television. One must ask themselves why an alleged professional attorney is so obsessed with Usenet and fantasy entertainment that he allowed his online conduct to cost him his job working for his own father. How bad does a son have to behave for a father to throw him out and cut him off.

Just one more reason why the people of Toms River, New Jersey should not be hiring the Law Offices of Charles Novins to perform their legal

services. Confidential information seems to find its way into the hands of identity thieves, the offices of opposing counsel, and unsavory crooks in far away countries known to be hotbeds of criminal activity.

Do intelligent attorneys hire drug addicts? Do integral attorneys allow drug addicts access to privileged information? Do professional attorneys spend their free time cyberstalking those they claim are cyberstalkers?

Charles Novins, a legacy of unprofessional conduct, risky business practices, and hypocrisy.

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